



Hogan Lovells US LLP  
390 Madison Avenue  
New York, NY 10017  
T +1 212 918 3000  
F +1 212 918 3100  
[www.hoganlovells.com](http://www.hoganlovells.com)

December 19, 2024

**Via ECF**

Honorable Mae A. D'Agostino  
United States District Court  
Northern District of New York  
445 Broadway  
Albany, NY 12207

Re: *Compass-Charlotte 1031, LLC v. Prime Capital Ventures, LLC, et al.*, 24-cv-00055

Dear Judge D'Agostino:

This firm is currently listed as counsel for Defendant Prime Capital Ventures, LLC ("Prime Capital") and the third-party defendants in the above matter (with the exception of Kris Roglieri and Tina Roglieri) (the "Third-Party Defendants").

Although this case is stayed, pursuant to the Court's Order dated August 19, 2024, the parties have agreed that Hogan Lovells US LLP ("Hogan Lovells") should no longer represent Prime Capital and the Third-Party Defendants. To that end, the parties have entered into the stipulation submitted with this letter as **Exhibit A**.

With respect to Ms. Humphrey, Hogan Lovells communicated to her earlier its intent to withdraw from the representation in this case and she consented. For clarity, we have simultaneously sent a copy of this letter to Ms. Humphrey.

Respectfully submitted,

*/s/ Pieter Van Tol*

Pieter Van Tol

cc: Counsel of record (by ECF)  
Kimberly Humphrey (via email)